

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
EASTERN DIVISION**

**SCOTT WOODS and
SHIHYUN WOODS**

Plaintiffs

v.

TESLA

Defendant.

C. A. NO.: 1:20-cv-10162 FDS

**PLAINTIFFS SCOTT AND SHIHYUN WOODS' MOTION FOR LEAVE TO
FILE A REPLY BRIEF**

Plaintiffs Scott and Shihyun Woods, by and through their attorneys, Kimmel and Silverman, PC, move this Honorable Court for leave, pursuant to Local Rule 7.1(b)(3), to file a Reply Brief in further support of Plaintiffs' Motion for Pro Hac Vice Admission of Attorney Jason L. Greshes (Docket #18). Plaintiffs' Reply Brief would provide relevant and material information to the Court on arguments made by Defendant in their Opposition. A proffer of grounds to be expanded upon and covered in Plaintiffs' Reply Brief follows.

1. Plaintiffs and Plaintiffs' Counsel have the absolute right to decide who is best to handle the litigation and trial aspects of this case.
2. Attorney Jason L. Greshes has considerable experience in Automobile Lemon Law and Breach of Warranty actions against Tesla.
 - a. Mr. Greshes has handled Lemon Law and Breach of Warranty cases in the Western District of New York, Eastern District of New York, District of New Jersey and Eastern District of Pennsylvania, including matters involving Tesla, McLaren, Aston-Martin, Ford, and multi-manufacturer

litigation involving expensive mobile homes in multiple federal jurisdictions.

- b. Mr. Greshes has handled cases against Tesla in the Eastern District of New York, as well as through Tesla's designated arbitration provider, AAA.
- c. Mr. Greshes has served as Plaintiff's counsel with Mr. Skanes serving as defense counsel in numerous Lemon Law and Breach of Warranty matters throughout Pennsylvania, New Jersey, and New York, including multiple open matters involving Mr. Skanes, and/or his firm, and defendants FCA US LLC, Toyota, Mercedes-Benz and Hyundai.

3. Defendant transferred this case to Federal Court, not Plaintiffs, and Defendant is now seeking to block Plaintiffs' choice of counsel.

4. Mr. Greshes is in the process of finalizing his application to the bar of Massachusetts, and then to Federal Court in Massachusetts, but due to COVID-19 and court closings this process has been slowed.

5. Defendant's objections fail to state a reason why the pro hac vice admission of Mr. Greshes would in anyway prejudice Defendant.

CERTIFICATION OF COMPLIANCE WITH LOCAL RULE 7.1

I hereby certify that counsel for Plaintiffs have conferred with counsel for Defendant and have attempted in good faith to resolve or narrow the issues relating to Plaintiffs' Motion for Pro Hac Vice Admission of Attorney Jason L. Greshes (Docket #18), Defendant's Opposition to same, and the need for the instant Motion for Leave to File a Reply Brief. Counsel for Plaintiffs have spent hours attempting to resolve these

issues before filing the instant Motion for Leave to File a Reply Brief. In an attempt to resolve these issues, this office conferred with defense counsel and were wholly rebuffed in efforts to resolve the same and in attempting to settle the case in its entirety.

WHEREFORE, the undersigned moves this Honorable Court to grant Plaintiffs leave to file a Reply Brief in further support of their Motion for Pro Hac Vice Admission of Attorney Jason L. Greshes.

KIMMEL & SILVERMAN, PC

Date: May 7, 2020

/s/ Angela K. Troccoli
Angela K. Troccoli, Esquire
BBO # 651593
30 E. Butler Pike
Ambler, PA 19002
(800) 668-3247 ext 308
atroccoli@creditlaw.com
Attorney for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the ECF system on this date, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to those indicated as non-registered.

Date: May 7, 2020

/s/ Angela K. Troccoli
Angela K. Troccoli, Esquire